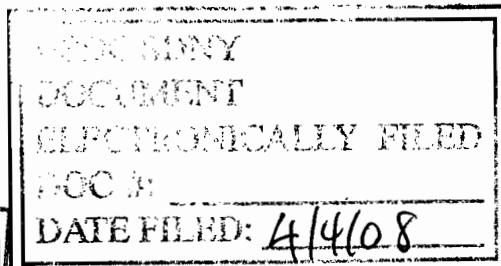
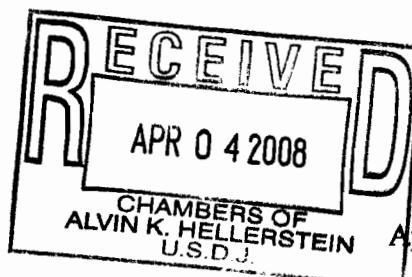


# Greenberg Traurig

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April 3, 2008

The motion for enlargement of time is denied. The pending motions are not fully deposited, and no good reason has been advanced to justify a stay. 4-4-08

*Alvin Hellerstein*

## VIA FACSIMILE

Honorable Alvin K. Hellerstein, U.S.D.J.  
United States District Court  
for the Southern District of New York  
500 Pearl Street, Room 1050  
New York, New York 10007

Re: *Phillips-Van Heusen Corp. v. International Home Textiles, Inc.*  
and Salo Grosfeld, 07 Civ. 8169 (AKH)

Dear Judge Hellerstein:

We represent defendants International Home Textiles, Inc. ("IHT") and Salo Grosfeld (the "Defendants") in the above-captioned matter. Counsel for defendants have conferred with counsel for plaintiff Phillips-Van Heusen Corporation ("PVH"), and respectfully submit this joint request for an extension of the Scheduling Order's April 14, 2008 deadline for the taking of depositions and completion of discovery.

As your Honor is aware, there are two motions currently pending before the Court: (i) Mr. Grosfeld's motion to dismiss PVH's claims against him, and (ii) PVH's motion to dismiss IHT's misrepresentation counterclaim. To date, the parties have engaged in document and interrogatory discovery and served interrogatories, however, given the pending motions, they have not taken any depositions. Counsel for the parties have conferred and agree that the Court's resolution of the pending motions will materially impact the subject matter and scope of the parties' depositions. Therefore, in order to conserve their resources and tailor their depositions to the actual issues in the case, the parties respectfully request an extension of the deposition deadline and discovery cut-off until 45 days after the Court rules on the pending motions to dismiss.

This is the parties' first request for an adjournment of the deposition deadline and discovery cut-off.

Hon. Alvin K. Hellerstein  
April 3, 2008  
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With regard to the deadlines in the Scheduling Order pertaining to a settlement conference between counsel for the parties (April 28, 2008); alternate dispute resolution (May 6, 2008); the filing of dispositive motions (June 5, 2008); answering papers to such motions (June 19, 2008); and replies on dispositive motions (June 26, 2008), pursuant to Rule 1.D. of the Court's Individual Rules, the parties respectfully request that they be permitted to submit a modified schedule to the Court within ten days after the Court renders a decision on the pending motions.

Respectfully submitted,



Timothy E. Di Domenico

cc: Arnold M. Weiss (by email)  
John F. Farraher, Jr. (by email)